

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	CC Docket No. 99-200
)	FCC 06-14
Numbering Resource Optimization)	

Comments of the Staff of the State Corporation Commission of the State of Kansas

In 1999 the Federal Communications Commission (Commission) initiated this proceeding to “examine a variety of measures intended to increase the efficiency with which telecommunications carriers use telephone numbering resources. The purpose of this effort is two-fold: to slow the rate of number exhaust in this country as evidenced by the ever-increasing rate at which new area codes are assigned; and to prolong the life of the North American Numbering Plan (NANP).¹ To that end, the Commission has adopted a number of area code conservation initiatives² dramatically slowing the demand for new central office codes, and thus, the demand for new area codes, and more efficiently utilizing codes already in use. The Staff of the Kansas Corporation Commission (KCC Staff) believes the most effective measure adopted by the Commission has been thousands block number pooling.

The KCC Staff notes mandatory deployment of thousands block number pooling in the 100 largest Metropolitan Statistical Areas, in accordance with the

¹ “Notice of Proposed Rulemaking,” *In the Matter of Numbering Resource Optimization*, CC Docket No. 99-200, FCC 99-122, ¶1, *rel.* June 2, 1999.

² “Report and Order and Further Notice of Proposed Rulemaking,” *In the Matter of Numbering Resource Optimization*, CC Docket No. 99-200, FCC 00-104, *rel.* March 31, 2000.

Commission's earlier orders in this proceeding, began in Kansas in August 2002 and were completed in October 2003. Current area code exhaust projections for Kansas range from 2013 for the 785 area code to 2028 for the 316 area code.

Because the Commission has already recognized the beneficial impact of thousands block number pooling³, and because the processes and methodologies used to implement and administer pooling are functioning well, the KCC Staff sees no reason to further delay the broader deployment of pooling and recommends the Commission expand the requirement for pooling to all rate centers with authority delegated to state commissions to grant waivers as special and limited circumstances may warrant. With pooling, the life expectancy of Kansas' four area codes will be extended and the costly disruption area code relief brings to consumers and businesses will be delayed. This is a particularly attractive benefit to Kansas in that the KCC Staff believes its next area code relief efforts will be much more difficult than the two prior efforts which split existing area codes along somewhat natural boundaries. In 1997, the 913 area code was split along the Topeka and Kansas City LATA boundary, adding the 785 area code. In 2001, the 316 area code was split along the Wichita Metropolitan Calling Area, adding the 620 code. The next relief splits will be along as yet undetermined boundaries which will most likely have little, if any, public recognition.

In addition, while Kansas does not have detailed costing estimates from the industry for deploying local routing number functionality and the minimal additional administrative costs associate with thousands block number pooling,

³ *In the Matter of Numbering Resource Optimization*, CC Docket No. 99-200, FCC 06-14, ¶16.

other states⁴ have obtained estimates that have been characterized as minimal, especially when compared to the costs and other disruptions caused by providing area code relief. Thousand block number pooling does not require local number portability, as previously believed⁵, but does require local routing number functionality. Many of Kansas' rural rate centers have already deployed these switching features.

Finally, ubiquitous pooling in all rate centers will offer the benefit of having service providers interface with only one administrative organization instead of the two organizations now required (the pooling administrator for pooled rate centers and the North American Numbering Plan Administrator for non-pooled rate centers).

The KCC Staff recommends, once the Commission implements mandatory pooling in all rate centers, the Commission schedule actual implementation in ascending order of forecasted exhaust, beginning with those codes not yet starting relief planning, with the pooling administrator's load controlling.

Respectfully Submitted,

/s/Colleen R. Harrell

Commission

The Staff of the Kansas Corporation

Susan B. Cunningham
General Counsel

⁴ See *Ex Parte* submission from the Nebraska Public Service Commission, Feb. 7, 2006, and *Ex Parte* submission from the Missouri Public Service Commission, Feb. 2006, CC Docket No. 99-200.

⁵ “Fifth Further Notice of Proposed Rulemaking,” *In the Matter of Numbering Resource Optimization*, CC Docket No. 99-200, FCC 06-14, ¶4, *rel.* February 24, 2006.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of Comments of the Staff of the State Corporation Commission of the State of Kansas was served this 9th day of May, 2006, by electronic filing and e-mail to the persons listed below.

By: /s/ Colleen R. Harrell

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